



P.O. Box 145, Delta Junction, AK 99737, USA
3204 International Street, Fairbanks, AK 99701, USA

Tel: +1 907 895 2841
Fax: +1 907 895 2866

December 8, 2014
COR-14-120
Certified Mail #7011 1570 0001 1559 2564
Emailed

Heather Valdez, Chemical Engineer
EPA Region 10
Office of Air, Waste and Toxics
1200 6th Ave, Suite 900, AWT-107
Seattle WA, 98101

Re: Demonstration of Compliance with Applicable Emission Limits in the Commercial and Industrial Solid Waste Incineration Units Rule

Dear Director:

Sumitomo Metal Mining Pogo LLC (Pogo) operates an incinerator that is designated Emission Unit ID 412 in its Alaska Department of Environmental Conservation (ADEC) air quality minor permit number AQ0406MSS07. Unit ID 412 is also subject to the *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units* (CISWI Units) as set forth in 40 CFR 60 Subpart CCCC. As required in §60.2242, Pogo submitted a Title V application to ADEC in July 2014.

Pogo recently installed a wet scrubbing system to control SO₂ emissions from the incinerator (Unit ID 412). A performance test was conducted between October 5 and 9, 2014 to demonstrate compliance with all the applicable emission limits in the CISWI Rule.

Because the performance test results demonstrate the incinerator, equipped with the wet scrubber, meets the SO₂ emission limit and all other applicable emission limits, Pogo intends to resume operating Unit ID 412 on December 15, 2014, in accordance with the requirements of permit number AQ0406MSS07 and the applicable CISWI Rule requirements.

Table 1 is a summary of the performance test results, which demonstrate that Unit ID 412 is in compliance with all the applicable emission limits of the CISWI Rule.

A copy of the final test report is attached, and intends to electronically submit the report on the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), accessed through the Central Data Exchange (CDX), within 60 days of the test's completion. The test report will include documentation of sampling and analytical methods used, as well as all field measurement data, sample custody records, laboratory reports, emissions measurement results, quality assurance/quality control procedures, and incinerator and scrubber operating data.

TABLE 1
Summary of CISWI Unit Performance Test Results
October 5 - 9, 2014

Pollutant	Test Results ¹	CISWI Emission Standards ²	Units
Particulate Matter	57	270	mg/dscm
Sulfur Dioxide	0	1.2	ppmdv
Nitrogen Dioxide	135	170	ppmdv
Carbon Dioxide	3.7	13	ppmdv
Dioxins/Furans (TEQ Basis)	0.12	31	ng/dscm
Dioxins/Furans (Total Mass Basis)	0.65	1,800	ng/dscm
Hydrogen Chloride	1.0	200	ppmdv
Cadmium	0.0041	0.67	mg/dscm
Lead	0.068	0.26	mg/dscm
Mercury	0.0013	0.0035	mg/dscm

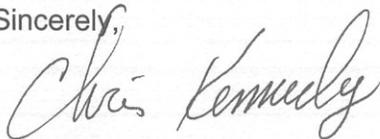
¹Average of three test runs, corrected to 7 percent oxygen dry basis.

²From Table 8 to Subpart CCCC of Part 60: all emission limitations are measured at 7 percent oxygen, dry basis at standard conditions.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

If you have any questions, please contact me at 907-895-2834 or email at chris.keneddy@smpogo.com or Ben Farnham at 907-895-2730 or ben.farnham@smpogo.com.

Sincerely,



Chris Kennedy
 General Manager